STATE OF MAINE
Department of Environmental Protection

MAIN OFFICE: RAY BUILDING, HOSPITAL STREET, AUGUSTA
MAIL ADDRESS: State House Station 17, Augusta, 04333
207-289-7688

JOHN R. McKERNAN, JR.
GOVERNOR

DEAN C. MARRIOTT
COMMISSIONER

September 28, 1990

Mr. James Shafer
Department of the Navy, Northern Division
Naval Facilities Engineering Command
Building 77-L
Philadelphia Naval Shipyard
Philadelphia, PA 19112-5094

Re: Naval Air Station Brunswick, Draft Final Phase I Feasibility Study Development and Screening of Alternatives, February 1990, by E.C. Jordan Co.

Dear Mr. Shafer:

The Maine Department of Environmental Protection (DEP) has completed its review of the Draft Final Phase I Feasibility Study Development and Screening of Alternatives, which was submitted to the DEP by E.C. Jordan Co. on August 9, 1990 on behalf of the U.S. Department of the Navy for the Naval Air Station Brunswick (NASB) Site.

The DEP conditionally approves of the alternatives presented in this report provided that the following comments are addressed:

General Comments:

The DEP requires ground water target clean up levels based on Maine Maximum Exposure Guideline Standards (MEG's). Soil clean up standards are set on a site by site basis based on risk assessments approved by the Department. The DEP has set PAH target levels as low as 1 ppm at sites where residential development was considered a future possibility. In instances where basewide contamination by particular contaminants is known to occur, the Navy should be prepared to compare proposed target clean up levels to known background levels.

When considering remedial alternatives, any action that is both financially and technically feasible which will provide a permanent solution and reduce or eliminate the need for deed restrictions, long term monitoring, and periodic reviews should be given preference.

Specific Comments:

Page	Section	Comments
2-6	table 2-1	Utilize the MEG of 50 ppb for Chromium and 0.15 ppb for Vinyl chloride rather than the MCL.
2-8	sec. 2.1.4	E.C. Jordan states that other non-point sources up gradient of Sites 1 & 3 are contributing to elevated iron and zinc levels in the Mere Brook system and that specific remedial action at these sites would not provide a permanent remedy. However, the DEP believes that Mere Brook would benefit from any remediation action that helped to reduce the overall impact on the system even if Ambient Water Quality Criteria (AWQC) are not achievable.
2-12	sec. 2.2.4	The Mere Brook ecosystem is being considered for mercury impact, therefore all possible steps should be taken to reduce mercury contamination from all known leachate sources.
2-18	table 2-4	Utilize MEG's for tetrachloroethane and cadmium rather that MCL's.
2-24	sec. 2.5.2	The DEP believes that the proposed 18 ppm PAH target clean up level for Site 8 is high, if based on a future scenario allowing free access. Such access would involve repetitive exposure by children. Consequently, if the current proposed alternatives cannot attain a lower target level, other alternatives will need to be developed and included for review.
5-2	sec. 5.1	Site 2 has been retained for remedial action alternatives. Continued monitoring of the three known leachate seeps was proposed as part of the action alternative. Based on the unexplained results from Lt-202 during the Round III sampling routine and on the presence of elevated concentrations of metals such as chromium, cobalt, lead and vanadium noted in Site 2 leachate seeps, the DEP requests that steps be taken to explain the presence of these contaminants and that steps be taken to provide possible remedial alternatives to reduce the leaching of the seep contaminants during periods of high runoff.
5-10	sec. 5.2	Any remedial action at Sites 4, 11, 13 should include both a source removal and active groundwater treatment. A permanent remediation will eliminate the need for continued actions.
6-44	sec. 6.5	The DEP suggests that a combination of source removal and groundwater treatment, such as a combination of alternatives 9C (Source Removal/Thermal Soil Aeration) and 9D (Groundwater Extraction/Treatment) be

developed for Site 9. Utilizing only 9C will require waiting for a natural flushing process to cleanse the groundwater aquifer at this site. Alternative 9D would treat groundwater but will do nothing to correct continued contamination from source areas.

If you have any concerns or questions regarding these comments, please contact me at (207) 289-2651.

Sincerely,

Ted Wolfe

Ted Wolfe
Division of Licensing and Enforcement
Bureau of Oil and Hazardous Materials Control

cc: Meghan Cassidy, EPA
Mel Dickenson, E.C. Jordan/ABB Environmental
Donald Gerrish, Town of Brunswick
Fred Lavalle, ME DEP
Loukie Lofchie, BACSE
Denise Messier, ME DEP
[redacted]
Susan Weddle, Community Representative

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